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UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA

THUNDER STUDIOS, INC.,

Plaintiff,

v.

CHARIF KAZAL; TONY KAZAL;
ADAM KAZAL; AND DOES 1 TO
100, INCLUSIVE,

Defendants.

Case No. 2:17-cv-00871 AB (SSx)

**DECLARATION OF RONALD
RICHARDS IN SUPPORT OF
OPPOSITION TO PLAINTIFF'S
NOTICE OF EX PARTE AND EX
PARTE APPLICATION FOR
ORDER AUTHORIZING EMAIL
SERVICE**

Judge: Honorable Andre Birotte Jr.
Ctrm: 7B

DECLARATION OF RONALD RICHARDS

I, RONALD RICHARDS, declare:

1. I am an attorney admitted to practice before this Court and all Courts of the State of California. I am the attorney for Specially Appearing Defendant, Charif Kazal. I have personal knowledge of the following facts and could testify to these facts if called upon to do so.
2. I never received a phone call nor a voicemail from Plaintiff's counsel, Mr. Weiner, regarding this proposed ex parte application. Had Mr. Weiner contacted me prior to filing this application, I would have had an opportunity to advise him of my client's position and the reasons why I would be opposing any proposed ex parte application.
3. I was not served of this ex parte application by email, facsimile transmission, or personal service. Nor was I advised that opposition papers must be filed no later than 24 hours following such service.
4. I learned of this ex parte application when I received an email at 7:00 p.m. May 15, 2017 from the Court's Electronic Filing system.
5. Upon receiving this email, I then looked up the Court's Local Rules and the Honorable Birotte's requirements to determine when my opposition papers were to be filed.
6. Upon learning of the local rules and the Judge's requirements, I emailed Mr. Weiner. Attached as **Exhibit A** is a true and correct copy my email correspondence with Mr. Weiner on May 16, 2017, advising him that his ex parte application violates numerous local rules. Mr. Weiner refused to withdraw his application.
7. Attached as **Exhibit B** is a true and correct copy of the list of countries that are members of the Hague Convention.

- 1 8. Attached as **Exhibit C** is a true and correct copy of the Central Authority and
2 practical information for Australia.
- 3 9. Attached as **Exhibit D** is a true and correct copy of the formal request form for
4 service abroad of judicial or extrajudicial documents.
- 5 10. Attached as **Exhibit E** is a true and correct copy of the declarations and
6 reservations made by Australia when it adopted the Hague Convention.
- 7 11. Attached as **Exhibit F** is a true and correct copy of the New South Wales
8 Consolidated Regulations, Uniform Civil Procedure Rule 2005- Regulation
9 10.20 titled Personal Service Required Only in Certain Circumstances.
- 10 12. I am only filing this opposition for the sole purpose of objecting to this court's
11 personal jurisdiction over my client and to provide procedural due process on a
12 request that I believe violates my clients rights under the Hague Convention.

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14 I declare under penalty of perjury under the laws of the United States of America
15 that that the foregoing is true and correct.

16
17 Executed on this 16th day of May, 2017 in Los Angeles, California.

18
19 \s\Ronald Richards

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21 Ronald Richards, Esq.
22 DECLARANT
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